



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

AHUVA SCHACHTER, MICHAEL
SMITH, DOUGLAS NEUJAHR,
SAMHITA GERA, and DENISH
BHAVSAR, Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs,

vs.

C.A. No. 2023-1112-NAC

IAN ROBERTSON, KEN MANGET,
CHRISTOPHER JARRATT,
MICHAEL HOFFMAN, PAUL
DALGLISH, BRAD SPARKES, and
ROBERT SCHAEFER,

Defendants.

**AFFIDAVIT OF ERIK LUEDEKE FILED ON BEHALF OF ROBBINS
GELLER RUDMAN & DOWD LLP IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF CALIFORNIA

: SS

COUNTY OF SAN DIEGO

I, Erik Luedeke, being duly sworn, depose and say:

1. I am a Partner with Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm") and a member of good standing of the California Bar. I am submitting this affidavit in support of an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-captioned action (the "Action").

2. Robbins Geller served as counsel on behalf of plaintiffs in this Action and took on this representation on a fully contingent basis.

3. The information in this affidavit regarding Robbins Geller's time and expenses is taken from time and expense records maintained by the Firm in the ordinary course of business. I reviewed my Firm's time and expense entries in connection with the preparation of this affidavit. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the Action. As part of this review, I removed certain time entries for attorneys and paralegals who contributed *de minimis* time to this Action. I believe that the time reflected in my resulting lodestar calculation and the expenses for which payment is sought as set forth in this affidavit are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the Action. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the adjustments for *de minimis* timekeeper entries described above, the attorneys and support staff at my Firm dedicated 953.90 hours from inception through April 28, 2026 (the day the parties reached an agreement-in-principle to settle the Action) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$928,937.50, based on the Firm's

current hourly rates that are the usual and customary rates charged for each individual in our cases. A breakdown of the hours and lodestar is as follows:

TIMEKEEPER	TOTAL HOURS FROM INCEPTION THROUGH 4/28/2026	RATE	TOTAL LODESTAR FROM INCEPTION THROUGH 4/28/2026
PARTNERS			
Baron, Randall J.	106.80	\$1,500.00	\$160,200.00
Luedeke, Erik W.	150.80	\$1,070.00	\$161,356.00
OF COUNSEL			
Avellino, Jason M.	588.60	\$955.00	\$562,113.00
ASSOCIATE			
Park, Michaela D.	18.40	\$435.00	\$8,004.00
INVESTIGATOR			
Brandon, Kelley T.	47.90	\$405.00	\$19,399.50
PARALEGAL			
McDade, Jaime A.	35.40	\$475.00	\$16,815.00
DOCUMENT CLERK			
Mosley, Charles Noah	6.00	\$175.00	\$1,050.00
TOTAL	953.90		\$928,937.50

5. After the adjustments for *de minimis* timekeeper entries described above, the attorneys and support staff at my Firm dedicated 30.60 hours from April 29, 2026 through August 26, 2026 (the day the parties executed and filed the settlement stipulation) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$32,742.00, based on the Firm's current hourly rates that are the usual and customary rates charged for each

individual in our cases. A breakdown of the Firm's hours and lodestar from April 29, 2026 through August 26, 2026 is as follows:

TIMEKEEPER	TOTAL HOURS FROM 4/29/2026 THROUGH 8/26/2026	RATE	TOTAL LODESTAR FROM 4/29/2026 THROUGH 8/26/2026
PARTNER			
Luedeke, Erik W.	30.60	\$1,070.00	\$32,742.00
TOTAL	30.60		\$32,742.00

6. At a high level, the work performed by my Firm during the period from inception through August 26, 2026 included: (i) investigating the claims underlying the Action; (ii) preparing the complaint and amended complaint; (iii) opposing defendants' motion to dismiss the amended complaint, which the Court denied in part; (iv) conducting fact discovery, including preparing document requests; negotiating for the production of documents; and reviewing and analyzing documents produced by defendants; (v) retaining and working with Canadian bankruptcy counsel to prevent the release of the claims asserted in this Action; and (vi) undertaking work in connection with the settlement in this Action.

7. During the course of this Action, Robbins Geller incurred and disbursed \$20,563.07 in expenses necessary to the prosecution of the Action through the present. These expenses are as follows:

ROBBINS GELLER DISBURSEMENTS	
Filing and Other Fees	\$2,385.20

Transportation, Hotels, and Meals	\$6,387.96
Expert (Matthew D. Cain dba Cleveland Analytics, LLC)	\$3,500.00
Canadian Bankruptcy Counsel	\$7,649.79
Outside Photocopies	\$32.88
Online Legal and Financial Research	\$598.64
eDiscovery Database Hosting	\$3.60
Publication	\$5.00
Total Disbursements:	\$20,563.07

8. These expenses are reflected in the books and records of the Firm. These books and records are prepared from invoices, bills, expense vouchers, and check records kept in the normal course of business.

6. I respectfully request that the Court award the attorneys' fees and expenses requested for the reasons set forth in Plaintiffs' Opening Brief in Support of Their Motion to Certify the Class, Approve the Proposed Settlement, Award Attorneys' Fees and Expenses, and Approve Service Awards.

Dated: October 14, 2026

Erik Luedeke

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Subscribed and sworn to (or affirmed) before me on this 14th day of October 2026, by Erik Luedeke, proved to me on the basis of satisfactory evidence to be the person who appeared before me.



Notary Public, State of California